

REMARKS

In the Office Action dated September 29, 2003, claims 1-3, 6-11, 14, 15, 17, 18, 22-27, 30-32, 34, and 37-40 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 6,453,034 (Donovan); claims 4, 5, 16, 19-21, 28, 29, 35, and 36 were rejected under § 103 over Donovan in view of U.S. Patent No. 6,584,490 (Schuster); and claim 12 was rejected under § 103 over Donovan in view of U.S. Patent No. 6,081,533 (Laubach).

Claim 1 has been amended to recite receiving a message from a first device to establish a communications session with a *USB* peripheral device and converting between data according to a first protocol (that defines real-time interactive sessions) and data according to a second protocol that defines a USB peripheral link from the system to the USB peripheral device. As conceded by the Office Action, Donovan fails to disclose a USB peripheral device or a USB peripheral link. However, the Office Action relied upon Schuster as teaching such a USB peripheral device or USB peripheral link.

However, Applicant respectfully submits that Schuster is not proper prior art against the subject matter of claim 1. Schuster (U.S. Patent No. 6,584,490) has a filing date of December 22, 1999, which is *later* than the November 12, 1999 filing date of the parent (U.S. Serial No. 09/439,501) of the present application. Schuster is a continuation-in-part of U.S. Patent No. 6,446,127 (filed November 30, 1999, which is still later than the November 12, 1999 date of the parent of the present application). U.S. Patent No. 6,446,127 is in turn a continuation-in-part of U.S. Patent No. 6,161,134, filed on October 30, 1998. Therefore, the § 102(e) date of Schuster that predates the priority date of the present application is October 30, 1998, which is the filing date of U.S. Patent No. 6,161,134.

However, U.S. Patent No. 6,161,134 (hereinafter "'134 patent'") discloses *less* subject matter than Schuster. The '134 patent does *not* disclose USB peripheral devices or peripheral links. No mention is made whatsoever in the '134 patent of the USB protocol. Therefore, to the extent that the Office Action has relied upon Schuster as teaching a USB peripheral device or USB peripheral link, such reliance is misplaced because the earlier filing date of Schuster (the filing date of the '134 patent) is the filing date of a prior patent that does not disclose USB. Therefore, the asserted combination of Donovan and Schuster does not teach or suggest the subject matter of claim 1. The same is true of all other independent claims that recite a USB peripheral device or USB protocol, including independent claim 16, independent claim 29, and

independent claim 37. Note that claim 16 has been amended from dependent form to independent form, with the scope of the claim remaining unchanged. The same is also true of claim 29.

For the foregoing reasons, independent claims 1, 16, 29, and 37 (and their respective dependent claims) are allowable over the cited references.

Claim 2 has been amended from dependent form to independent form. As amended, claim 2 is allowable over Donovan. Donovan fails to disclose a peripheral link that is selected from the group consisting of a Universal Serial Bus port, a parallel port, a serial port, a Small Computer Systems Interface port, and a Personal Computer Memory Card International Association port.

Claim 13 has been amended from dependent form to independent form, with the scope of claim 13 remaining *unchanged*. The Office Action has provided no explanation regarding how claim 13 is anticipated by or rendered obvious over the cited references. It is respectfully submitted that claim 13 be allowable.

Claim 18 has been amended from dependent form to independent form, and as amended, is allowable over Donovan. Donovan fails to disclose that the second interface is selected from the group consisting of a Universal Serial Bus port, a parallel port, a serial port, a Small Computer Systems Interface port, and a Personal Computer Memory Card International Association port.

Independent claim 32 is similarly allowable over Donovan.

Claim 27 has been amended from dependent form to independent form, with the scope of claim 27 remain unchanged. In the rejection of claim 27, the Office Action asserted that the gateway 55 or 61 is a non-telephony device. That is not the case, as the gateway 55 or 61 disclosed in Donovan is provided specifically to perform telephony functions (*see* Figure 3). As shown in Figure 3 of Donovan, each gateway 55 or 61 includes a signaling gateway (to perform telephony signaling) and a media gateway (to perform voice processing). Put another way, the gateway 55 or 61 is a node in the telephony network disclosed in Figure 2 of Donovan. It is not a non-telephony device. Therefore, claim 27 is allowable over Donovan.

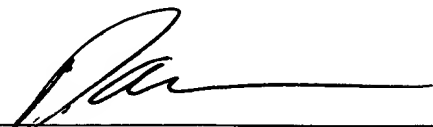
In view of the foregoing, it is respectfully submitted that all claims are in condition for allowance, which action is respectfully requested. The Commissioner is authorized to charge

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any additional fees and/or credit any overpayment to Deposit Account No. 20-1504
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Respectfully submitted,

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